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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARY JEAN HONG,

Plaintiff,

v.

RIGHT MANAGEMENT
CONSULTANTS, INC., DOES 1 through
100, inclusive,

Defendants.

Case No. C04 4011 PJH (EDL)

DISCOVERY MATTER

**STIPULATION AND [PROPOSED]
ORDER EXTENDING EXPERT
DISCOVERY CUTOFF DATE TO
ACCOMMODATE DEPOSITIONS OF
RHOMA YOUNG AND JERALD
UDINSKY**

WHEREAS the expert discovery cutoff date in this case is February 22, 2006;

WHEREAS one of plaintiff's retained expert witnesses, Ms. Rhoma Young, must undergo abdominal surgery on February 15, 2006, and is unavailable to sit for deposition before February 15, 2006, due to other obligations and in order for her to complete preparations for her surgery;

WHEREAS Ms. Young will require a reasonable period of convalescence following the surgery in order to become physically able to sit for the deposition, and believes she will be physically able to sit for deposition by March 8, 2006;

WHEREAS due to other prior commitments, one of defendant's retained experts, Dr. Jerald Udinsky, Ph.D., is unavailable to sit for deposition during reasonable business hours at any point before March 2006, but can be available to sit for deposition on March 6, 2006; and

WHEREAS the parties agree that, under these circumstances, good cause exists to grant a short extension of the February 22, 2006 expert discovery cutoff date to allow for these particular depositions to go forward on the dates proposed above;

IT IS HEREBY STIPULATED AND AGREED by and between the Parties hereto through their undersigned counsel, that the deposition of Ms. Rhoma Young shall take place on March 8, 2006 and the deposition of Dr. Jerald Udinsky shall take place on March 6, 2006.

IT IS SO STIPULATED.

DATED: February 10, 2006

By: _____ /s/
PAUL D. HERBERT
THE LOUDERBACK LAW FIRM
Attorneys for Plaintiff
MARY JEAN HONG

DATED: February 10, 2006

By: _____ /s/
RONALD D. ARENA
LITTLER MENDELSON, P.C.
A Professional Corporation
Attorneys for Defendant
RIGHT MANAGEMENT
CONSULTANTS, INC.

1 **SO ORDERED.**

2 DATED: February 14, 2006

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